

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS**

**TIMOTHY WILLIAMS,**  
Plaintiff,

v.

Case No. 4:25cv3027

**HOUSTON COMMUNITY COLLEGE, DR. LATOYA BROWN, CHERYLYN JOSEPH,  
SHANETTA BURKE, et al.,**  
Defendants.

United States Courts  
Southern District of Texas  
FILED

**6/27/2025**

Nathan Ochsner, Clerk of Court

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**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**

**JURISDICTION AND VENUE**

1. **Jurisdiction:** This action arises under the United States Constitution and federal statutes, including but not limited to 42 U.S.C. § 1983, the Americans with Disabilities Act (ADA), 42 U.S.C. § 12101 et seq., Title VII of the Civil Rights Act of 1964 (if applicable to employment), and relevant civil rights laws. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343.
2. **Venue:** Venue is proper in this district under 28 U.S.C. § 1391(b) because the events occurred in Houston, Texas.

**PARTIES**

3. **Plaintiff:** Timothy Williams, a resident of 9701 Market St., Apt. 328, Houston, Texas 77029. Contact information: [timwaywil47@gmail.com](mailto:timwaywil47@gmail.com), +1 (832) 362-4481
4. **Defendants:**
  - **Houston Community College:** A public institution of higher education located at 3100 Main Street, Houston, Texas.
  - **Dr. LaToya Brown:** An individual employed by Houston Community College.
  - **Cherylyn Joseph:** An individual employed by Houston Community College.
  - **Shanetta Burke:** An individual employed by Houston Community College.
  - **Et al.:** Other individuals whose identities are currently unknown to Plaintiff but who may be identified during discovery.

## STATEMENT OF FACTS

5. **Background:** Plaintiff is an exemplary student at Houston Community College (HCC) with a consistent B/A GPA, Dean's List, and Honor Roll recognition. Plaintiff is a disabled individual and has experienced recurring issues with HCC's Financial Aid Department, necessitating Satisfactory Academic Progress (SAP) appeals every semester despite strong academic performance.
6. **Incident:** On June 2, 2025, Plaintiff sent emails to HCC Financial Aid regarding urgent to-do list issues that threatened his academic progress. On June 10, 2025, HCC issued serious conduct charges (Case #2024168001) against Plaintiff, alleging bullying, threatening behavior, and disruptive activity based solely on unidentified witness statements from a Financial Aid Office visit.
7. **Administrative Conference:** On June 16, 2025, Plaintiff attended an administrative conference with Dr. LaToya Brown. Plaintiff denied any misconduct and requested review of video footage from the Financial Aid area to provide objective evidence. Dr. Brown refused, stating: "All I need is enough witnesses, I don't need any video."
8. **Due Process Violations:** HCC's investigation violated fundamental due process by:
  - Refusing to review available video evidence;
  - Failing to provide specific details of alleged misconduct;
  - Denying Plaintiff the identity of accusers and their statements;
  - Preventing Plaintiff from having a meaningful opportunity to respond; and
  - Conducting an inadequate and biased investigation.
9. **Pattern of Discrimination:** The timing of these false charges, immediately after Plaintiff's emails asserting federal compliance violations, suggests retaliation. Combined with three years of recurring financial aid problems despite Plaintiff's academic excellence, this indicates systematic discriminatory treatment interfering with Plaintiff's educational opportunities.
10. **Personal Characteristics:** Plaintiff believes that his disability, race/color, and sex influenced the way he was treated by Defendants. Additionally, Plaintiff is a male in an administration that is predominantly staffed by women. Plaintiff has been open about his status as an ex-felon, with his conviction occurring over twelve years prior, and believes that this status was also a factor in the discriminatory treatment he has received at HCC.

## CLAIMS FOR RELIEF

### **11. Violation of Civil Rights – 42 U.S.C. § 1983:**

Defendants, acting under color of state law, deprived Plaintiff of his rights to due process and equal protection under the Fourteenth Amendment.

### **12. Violation of the Americans with Disabilities Act (ADA) and/or Section 504 of the Rehabilitation Act:**

Defendants failed to provide reasonable accommodations for Plaintiff's disability and discriminated against Plaintiff on the basis of his disability.

### **13. Discrimination Based on Sex and Prior Felony Conviction:**

Defendants discriminated against Plaintiff on the basis of his sex as a male in a predominantly female administration and on the basis of his status as an ex-felon, with his conviction over twelve years prior, in violation of the Equal Protection Clause of the Fourteenth Amendment and applicable federal and state laws. Plaintiff alleges that Defendants' actions were motivated, in part, by unlawful bias against males and individuals with prior felony convictions. Texas law prohibits consideration of criminal records older than ten years for certain purposes.

### **14. Retaliation:**

Defendants retaliated against Plaintiff for asserting his rights under federal law.

### **15. Other Claims:**

Defendants' actions also violated HCC's own Student Rights & Responsibilities policy, which guarantees students the right to review supporting documentation, know witness identities, and present evidence.

## DAMAGES

### **17. Compensatory Damages:**

Plaintiff seeks \$10,000,000 in compensatory damages for severe emotional distress, mental health injuries, financial hardship, and disruption of academic progress caused by Defendants' unlawful conduct, including suspension, biased investigation, and due process violations.

### **18. Punitive Damages:**

Plaintiff seeks \$10,000,000 in punitive damages to punish Defendants for their intentional, malicious, and biased conduct, and to deter similar behavior in the future.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

1. **Declare** that Defendants violated Plaintiff's rights under the United States Constitution and federal law;
2. **Order** Defendants to cease any ongoing violations of Plaintiff's rights;
3. **Order** Defendants to conduct a fair re-investigation of the charges against Plaintiff, including review of all video evidence;
4. **Order** Defendants to provide Plaintiff with all witness statements and supporting documentation;
5. **Order** Defendants to implement proper due process procedures;
6. **Order** remedial measures addressing administrative harassment and discrimination based on sex and prior felony conviction;
7. **Monitor** Defendants' compliance with federal civil rights laws;
8. **Award** Plaintiff \$10,000,000 in compensatory damages for emotional distress, mental health impact, financial hardship, and disruption of academic progress;
9. **Award** Plaintiff \$10,000,000 in punitive damages;
10. **Award** Plaintiff reasonable attorney's fees and costs, if applicable; and
11. **Grant** such other and further relief as the Court deems just and proper.

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**VERIFICATION**

I, Timothy Williams, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on \_\_\_\_\_, 2025.

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Pro Se Plaintiff

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